

# EXHIBIT 7

**Kaycee L. Weeter**

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**From:** Chalos, Mark P. <mchalos@lchb.com>  
**Sent:** Monday, March 28, 2016 5:15 PM  
**To:** Kaycee L. Weeter  
**Cc:** mgalligan@galligannewmanlaw.com; beng@branstetterlaw.com; Martin, Annika K.; Hoffman, Eric; yvonne.puig@nortonrosefulbright.com; Chris J. Tardio; Matt H. Cline; C. J. Gideon  
**Subject:** Re: Meningitis Litigation - Matthew Lee, MD  
**Attachments:** image001.gif

Kaycee- Based on the reasoning you laid out below, we do not see any reason to strike Dr Lee at this point. If you have authority or some other reasoning, we are happy to consider your position.

Thank you.

-Mark

Sent from my iPhone

On Mar 28, 2016, at 8:28 AM, Kaycee L. Weeter  
<kaycee@gideoncooper.com<mailto:kaycee@gideoncooper.com>> wrote:

Mark and Mike:

Please let us know by the close of business today if you will or will not agree to strike Dr. Lee. As stated in the email below, the timeline is tight, and we do not want to push this issue beyond the April status conference. If we do not hear from you today, we will plan to file the motion tomorrow morning.

Thanks,

Kaycee

From: Kaycee L. Weeter  
Sent: Monday, March 21, 2016 8:43 AM  
To: 'Chalos, Mark P.'; mgalligan@galligannewmanlaw.com<mailto:mgalligan@galligannewmanlaw.com>  
Cc: beng@branstetterlaw.com<mailto:beng@branstetterlaw.com>; Martin, Annika K.; Hoffman, Eric; yvonne.puig@nortonrosefulbright.com<mailto:yvonne.puig@nortonrosefulbright.com>; Chris J. Tardio; Matt H. Cline; C. J. Gideon  
Subject: RE: Meningitis Litigation - Matthew Lee, MD

Mark:

I understand you are on vacation this week. Unfortunately, the timeline is tight, and we do not want to push this issue beyond the April status conference. If it is a simple misunderstanding, tell us the misunderstanding, or have one of the other lawyers on the PSC or who disclosed Lee tell us what we are missing. Send us the case or order that supports your position that Lee – a common issue expert – can be withheld until the case-specific deadline, and disclosed then without any case-specific opinions. I doubt you are going to just agree to our motion. Let's not unnecessarily delay this. Either tell us what you think we are missing, or just tell us you do not agree, and we can present it to the Court for a decision. We will plan to file by the middle of this week to avoid unnecessarily delaying resolution of this issue.

Mike: Same questions apply: do you agree to the motion in Brock? If not, just tell us, and we will file it so that we can get this on the docket.

Thanks,

Kaycee

From: Chalos, Mark P. [mailto:mchalos@lchb.com]  
Sent: Sunday, March 20, 2016 12:19 PM  
To: Kaycee L. Weeter; mgalligan@galligannewmanlaw.com<mailto:mgalligan@galligannewmanlaw.com>  
Cc: beng@branstetterlaw.com<mailto:beng@branstetterlaw.com>; Martin, Annika K.; Hoffman, Eric; yvonne.puig@nortonrosefulbright.com<mailto:yvonne.puig@nortonrosefulbright.com>; Chris J. Tardio; Matt H. Cline; C. J. Gideon  
Subject: RE: Meningitis Litigation - Matthew Lee, MD

Thank you. It sounds like your firm is operating from a misunderstanding of MDL practice. But, we'll consider your request and get back with you the week of 3/28.

From: Kaycee L. Weeter [mailto:kaycee@gideoncooper.com]  
Sent: Sunday, March 20, 2016 12:16 PM  
To: Chalos, Mark P.; mgalligan@galligannewmanlaw.com<mailto:mgalligan@galligannewmanlaw.com>  
Cc: beng@branstetterlaw.com<mailto:beng@branstetterlaw.com>; Martin, Annika K.; Hoffman, Eric; yvonne.puig@nortonrosefulbright.com<mailto:yvonne.puig@nortonrosefulbright.com>; Chris J. Tardio; Matt H. Cline; C. J. Gideon  
Subject: RE: Meningitis Litigation - Matthew Lee, MD

Mark:

The basis for the request is that Dr. Lee's case-specific reports contain common issue opinions, which required him to be disclosed as a common issue expert.

Thanks,

Kaycee

From: Chalos, Mark P. [mailto:mchalos@lchb.com]  
Sent: Sunday, March 20, 2016 12:08 PM  
To: Kaycee L. Weeter; mgalligan@galligannewmanlaw.com<mailto:mgalligan@galligannewmanlaw.com>  
Cc: beng@branstetterlaw.com<mailto:beng@branstetterlaw.com>; Martin, Annika K.; Hoffman, Eric; yvonne.puig@nortonrosefulbright.com<mailto:yvonne.puig@nortonrosefulbright.com>; Chris J. Tardio; Matt H. Cline; C. J. Gideon  
Subject: RE: Meningitis Litigation - Matthew Lee, MD

Kaycee- I am on vacation with my family this week, so we will not be in a position to respond at least until the following week. In the meantime, please explain the basis for your request. Thank you.

-Mark

<image001.gif>

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From: Kaycee L. Weeter [mailto:kaycee@gideoncooper.com]  
Sent: Sunday, March 20, 2016 11:54 AM  
To: mgalligan@galligannewmanlaw.com<mailto:mgalligan@galligannewmanlaw.com>; Chalos, Mark P.  
Cc: beng@branstetterlaw.com<mailto:beng@branstetterlaw.com>; Martin, Annika K.; Hoffman, Eric;  
yvonne.puig@nortonrosefulbright.com<mailto:yvonne.puig@nortonrosefulbright.com>; Chris J. Tardio; Matt H.  
Cline; C. J. Gideon  
Subject: Meningitis Litigation - Matthew Lee, MD

Mike and Mark:

Will you agree to strike Dr. Lee as a case-specific expert for the Brock, Wray, and Ziegler cases? Please let me know by the close of business on Wednesday, March 23 if you will or will not agree.

Thanks,

Kaycee Weeter

Kaycee L. Weeter, Esq.  
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